

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS)	Master Docket No.:
PRODUCTS LIABILITY LITIGATION)	2:18-mn-2873-RMG

CITY OF CAMDEN, et al.,)	Civil Action No.:
)	2:23-cv-03230-RMG
<i>Plaintiffs,</i>)	
)	
-vs-)	
)	
E.I. DUPONT DE NEMOURS AND COMPANY (n/k/a)	
EIDP, Inc.), et al.)	
)	
<i>Defendants.</i>)	

**PROPOSED CLASS COUNSEL’S CONSENT MOTION FOR EXTENSION OF TIME
TO ALLOW RESPONSES TO PLAINTIFFS’ MOTION FOR PRELIMINARY
APPROVAL OF CLASS SETTLEMENT**

Proposed Class Counsel, with the consent of The Chemours Company, The Chemours Company FC, LLC, DuPont de Nemours, Inc., Corteva, Inc., and E.I. DuPont de Nemours and Company (n/k/a/ EIDP, Inc.) (the “DuPont Entities”), move for an extension of time for an additional seven (7) days, until August 7, 2023, to allow for the submission of responses, if any, to Plaintiffs’ Motion for Preliminary Approval.

Specifically, as requested by certain state Attorney Generals, proposed Class Counsel (with the DuPont Entities’ consent) agree to a 7-day extension for the States to respond to Plaintiffs’ Motion for Preliminary Approval of Class because progress is being made to address concerns raised by the States. Proposed Class Counsel, the DuPont Entities and the States have exchanged ideas about language that would satisfy the concerns that have been presented, with some issues already agreed upon.

Given the productive nature of the discussions, proposed Class Counsel, with the consent of the DuPont Entities, submit that an additional seven (7) day extension of time for responses to the Plaintiffs' Motion for Preliminary Approval, subject, of course, to the Court's approval, until August 7, 2023, would be beneficial. During this period, the undersigned intend to continue the ongoing discussions directed to the issues raised.

Wherefore, proposed Class Counsel submit that a 7-day extension of time, up to and including August 7, 2023, be allowed for the submission of responses, if any, to Plaintiffs' Motion for Preliminary Approval.

Dated: July 31, 2023

Respectfully Submitted,

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Proposed Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 31st day of July 2023 and was thus served electronically upon counsel of record.

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